

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re:	§	
	§	Chapter 11
TREESAP FARMS, LLC, et al.	§	
	§	Case No. 25-90017 (ARP)
Debtors.	§	
	§	
	§	(Jointly Administered)
	§	

**LIMITED OBJECTION OF BARBARA J. OKI AND LISA VERGEL DE DIOS,
aka LISA KLEIN OKI, TO POSSIBLE ASSUMPTION AND ASSIGNMENT
OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES**

Barbara J. Oki and Lisa Vergel De Dios submit this Limited Objection to the Notice of Possible Assumption and Assignment of Certain Executory Contracts and Unexpired Leases (“Auction Notice”), as follows.

The Debtors filed the Auction Notice on April 4, 2025. Exhibit 1 to the Auction Notice is a Contracts Schedule which lists the Assigned Contracts the Debtors intend to assign to the Purchaser. On that Exhibit 1, the Debtors also list the Cure Costs for each Assigned Contract.

Landlords are the landlords on the lease (and the amendments thereto) (collectively, “Lease”) concerning four parcels of real property located on Florin Road, Bradshaw Road, and Elder Creek Road in Sacramento, California (collectively “Premises”). TSV Opco, LLC is the tenant and TreeSap Farms, LLC is the guarantor.

The Lease and the amendments thereto are listed as items #14 through #20 on Exhibit 1 to the Auction Notice. The Debtors state that \$28,722.40 is the Cure Cost for the Lease. (See Exhibit 1 to Auction Note, Items #14 through #20.)

The Cure Cost identified by the Debtors is incorrect. The Lease requires the tenant to pay the real property taxes associated with the Premises. The unpaid real property taxes are \$19,531.72. As a result, the Cure Cost for the lease is \$48,304.12.

The post-petition monthly rent payments due under the Lease are current through April of 2025. If any monthly rent payments due under the Lease are not paid prior to the assumption of the Lease, the Cure Cost will increase.

[Signature on the following page]

Dated: April 9, 2025

Respectfully submitted,

/s/ Thomas P. Griffin, Jr.

Hefner, Stark & Marois, LLP

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Counsel for Creditors

BARBARA J. OKI AND LISA VERGEL

DE DIOS, aka LISA KLEIN OKI,

CERTIFICATE OF SERVICE

I certify that on April 10, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

In addition, I electronically served the foregoing document

☒ By E-Mail or Electronic Transmission: I caused the documents to be sent to the persons at the e-mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful:

Official Committee of Unsecured Creditors

Dynasty Grower Supply
9052 Del Mar Ave
Montclair, CA 91763

Nutrien Ag Solutions, Inc.
PO Box 943
Powhatan, VA 23139

BWI Companies, Inc.
1355 N Kings Hwy
Nash, TX 75569

Star Roses and Plants
8 Federal Road, Suite 6
West Grove, PA 19390

Wilbur-Ellis Company
920 N Argonne Rd., Suite 304
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Eric M. English
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☒ By Mail on the interested party(ies) in the case above-referenced, in accordance with Code of Civil Procedure section 1013(a), by placing a true copy of the above-referenced document(s) enclosed in a sealed envelope, with postage fully prepaid, in the designated area for outgoing mail in accordance with this office's practice whereby the mail is deposited in a United States Postal Service mailbox in the city of Sacramento, California, after the close of the day's business, at the addresses as set forth below:

The Office of the United States Trustee
for the Southern District of Texas,
515 Rusk Street, Suite 3516
Houston, Texas 77002

Miami-Dade Office of the Tax Collector
c/o Nikolas Rogers
200 NW 2ND Avenue
Suite 423
Miami, FL 33128

/s/ Thomas P. Griffin, Jr.
Thomas P. Griffin, Jr.